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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$1,537,494.74  
SEIZED FROM CHASE BANK, and

APPROXIMATELY \$2,601.24 SEIZED  
FROM BANK OF AMERICA,

Defendants.

2:21-MC-00199-WBS-JDP

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Ru Cong Ye (“claimant”), by and through their respective counsel, as follows:

1. On or about May 24, 2021, claimants filed a claim in the administrative forfeiture proceeding with the U.S. Customs and Border Protection (“CBP”) with respect to the Approximately \$1,537,494.74 seized from Chase Bank and Approximately \$2,601.24 seized from Bank of America (hereafter “defendant funds”), which were seized on August 3, 2020 and August 4, 2020.

2. CBP has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

1           3.       Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
2 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are  
3 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
4 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
5 That deadline was August 22, 2021.

6           4.       By Stipulation and Order filed August 23, 2021, the parties stipulated to extend to  
7 September 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
8 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
9 forfeiture.

10          5.       By Stipulation and Order filed September 22, 2021, the parties stipulated to extend to  
11 October 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
12 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
13 forfeiture.

14          6.       By Stipulation and Order filed October 21, 2021, the parties stipulated to extend to  
15 November 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
17 forfeiture.

18          7.       By Stipulation and Order filed November 22, 2021, the parties stipulated to extend to  
19 December 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
21 forfeiture.

22          8.       By Stipulation and Order filed December 27, 2021, the parties stipulated to extend to  
23 January 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
25 forfeiture.

26          9.       By Stipulation and Order filed January 18, 2022, the parties stipulated to extend to  
27 February 10, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
28 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to

1 forfeiture.

2 10. By Stipulation and Order filed February 10, 2022, the parties stipulated to extend to  
3 March 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
4 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
5 forfeiture.

6 11. By Stipulation and Order filed March 11, 2022, the parties stipulated to extend to April  
7 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

9 12. By Stipulation and Order filed April 12, 2022, the parties stipulated to extend to May 11,  
10 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
11 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

12 13. By Stipulation and Order filed May 11, 2022, the parties stipulated to extend to June 10,  
13 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
14 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

15 14. By Stipulation and Order filed June 14, 2022, the parties stipulated to extend to July 11,  
16 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
17 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

18 15. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
19 to August 10, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
21 forfeiture.

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3 16. Accordingly, the parties agree that the deadline by which the United States shall be  
4 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
5 alleging that the defendant funds are subject to forfeiture shall be extended to August 10, 2022.

6 Dated: 7/7/2022

PHILLIP A. TALBERT  
United States Attorney


7  
8 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

9  
10 Dated: 7/7/2022

/s/ Seth P. Chazin  
SETH P. CHAZIN  
Attorney for potential claimant  
Ru Cong Ye  
(Signature authorized by phone)

11  
12  
13  
14 **IT IS SO ORDERED.**

15 Dated: July 8, 2022

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WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE